UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

IN RE:

\$ CHAPTER 11

\$ SHERWIN ALUMINA COMPANY, LLC, \$ CASE NO. 16-20012

ET AL.

\$ (Jointly Administered)

NOTICE OF WITHDRAWAL OF (1) MOTION OF OUTOTEC (USA) INC. FOR RECLAMATION OF GOODS; (2) DECLARATION OF PAUL SOHLBERG IN SUPPORT OF MOTION OF OUTOTEC (USA) INC. FOR RECLAMATION OF GOODS; AND (3) LIMITED OBJECTION OF OUTOTEC (USA) INC. TO EMERGENCY MOTION OF SHERWIN ALUMINA COMPANY, LLC, ET AL. FOR ENTRY OF INTERIM AND FINAL ORDERS (I) AUTHORIZING DEBTORS TO (A) OBTAIN POSTPETITION SECURED FINANCING AND (B) UTILIZE CASH COLLATERAL, (II) GRANTING LIENS AND PROVIDING SUPERPRIORITY ADMINISTRATIVE EXPENSE CLAIMS, (III) GRANTING ADEQUATE PROTECTION TO PREPETITION LENDER, (IV) MODIFYING THE AUTOMATIC STAY, AND (V) SCHEDULING A PERMANENT FINANCE HEARING PURSUANT TO SECTIONS 105, 361, 362, 363, 364 AND 507 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002, 4001 AND 9014

PLEASE TAKE NOTICE that Outotec (USA) Inc. hereby withdraws the following:

- 1. Motion of Outotec (USA) Inc. for Reclamation of Goods [D.E. 228];
- 2. Declaration of Paul Sohlberg in Support of Motion of Outotec (USA) Inc. for Reclamation of Goods [D.E. 229]; and
- 3. Limited Objection of Outotec (USA) Inc. to Emergency Motion of Sherwin Alumina Company, LLC, et al. for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Secured Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Lender, (IV) Modifying the Automatic Stay, and (V) Scheduling a Permanent Finance Hearing Pursuant to Sections 105, 361, 362, 363, 364 and 507 of the Bankruptcy Code and Bankruptcy Rules 2002, 4001 and 9014. [D.E. 230.]

Dated: February 29, 2016 Respectfully submitted,

COUNSEL FOR OUTOTEC (USA) INC.

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